

**IN THE UNITED STATES DISTRICT COURT
THE EASTERN DISTRICT OF PENNSYLVANIA**

CURTIS LEE	:	CIVIL ACTION
	:	
PLAINTIFF	:	NO. 18-05332
	:	
v.	:	
	:	
CITY OF PHILADELPHIA, et al.	:	
	:	
DEFENDANTS	:	

JOINT STATUS REPORT PURSUANT TO RULE 26(F)

Plaintiff's counsel: Rania Major, Esquire

Defense counsel: Meghan Claiborne, Esquire

Plaintiff's counsel has authority to settle at the conference.

Defense counsel has authority to settle at this time.

The parties held a conference on 1/23 and 24/19

The parties are exchanging all self-executing disclosures.

The Defendants expect to file motions for summary judgment under Rule 56.

The issues will be developed during discovery. It would be suggested that motions are due 30 days after discovery closes.

Both sides anticipate experts on the Monell claims. Plaintiff also has medical experts. The defense has not made a decision on medical experts as of yet.

The parties anticipate that six months are necessary for discovery. Note: Both parties agree that this case needs to be stayed and would not be ripe for discovery until Plaintiff's PCRA decision and/or appeal thereafter is completed.

Plaintiff's case will take about 4 -5 days. Defendants' case will take about 2 -3 days

Both counsel agree that a settlement conference after discovery will be helpful.

The plaintiff agrees to a magistrate judge for trial. The defense does not agree.

Plan for Discovery:

1. Both parties agree that discovery can be completed within 6 months after the stay is lifted, assuming it is granted.
2. N/A
3. The parties anticipate issues about IAD files, Monell discovery, and causes of action depending on the stay.
4. See #3 above.
5. The parties anticipate there may be disagreements on discoverable material and motions may be necessary. Furthermore, there are a substantial number of depositions and materials to be gathered and scheduled.